

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 14-00253-01-CR-W-HFS
)	
REGINALD D. ABBOTT,)	
)	
Defendant.)	

MOTION TO WITHDRAW

COMES NOW the defendant, Reginald D. Abbott, through counsel, Robert Kuchar, Assistant Federal Public Defender and moves this Court for an Order granting leave to withdraw as counsel of record for the defendant based on an irreconcilable conflict of interest.

SUGGESTIONS IN SUPPORT

1. On September 18, 2014, the defendant was indicted for unlawful possession of a firearm in violation of 18 U.S.C. § 922(g)(1).
2. The Office of the Federal Public Defender for the Western District of Missouri was appointed to represent Mr. Abbott.
3. Recently, counsel learned that one of his current clients' legal interests are directly adverse to Mr. Abbott's legal interests. After receiving this information, the Federal Defenders Office formed the legal opinion that Mr. Abbott's legal interests are directly adverse to the above referenced client who is currently represented by the Federal Public Defender.
4. For the above stated reasons, counsel submits that a conflict of interest exists with the representation of Mr. Abbott and one of counsel's current clients.

WHEREFORE, for the reasons set forth herein, Robert Kuchar, moves this Court for an Order granting leave to withdraw as counsel for defendant, Reginald D. Abbott, and for the Court

to appoint alternate counsel that will be able to represent the defendant without the burden of this conflict of interest.

Respectfully submitted,

/s/ Robert Kuchar
ROBERT KUCHAR
Assistant Federal Public Defender
818 Grand Avenue, Suite 300
Kansas City, Missouri 64106
(816) 471-8282

CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby certified that one copy of the foregoing Motion was delivered to Justin G. Davids, Assistant United States Attorney, Western District of Missouri, Counsel for Plaintiff, 400 E. 9th St., 5th Floor, Kansas City, Missouri 64106, this 30th day of January, 2015.

/s/ Robert Kuchar
ROBERT KUCHAR